INDIANAPOLIS 462

TITE IN THE LUTION CONTROL BOARD

December 16, 1977

EPA Region 5 Records Ctr.

Mr. Daniel R. Olson East Chicago Sanitary District 5200 Indianapolis Boulevard East Chicago, IN 46312

Dear Mr. Olson:

Re: East Chicago Sewage Treatment Plant Sludge

This will acknowledge your phone conversation with Mr. Bruce Palin of the Solid Waste Management Section on December 1, 1977, concerning the above-referenced subject.

The staff reviews each of the hazardous waste proposals for land disposal on a case-by-case basis. There are no set heavy metal concentration levels which a waste must exceed before it is considered a hazardous waste. Instead, the staff prefers to use the drinking water standards as a basis and evaluate how detrimental any concentrations exceeding the drinking water standard levels may be to groundwater. The East Chicago Sewage Treatment Plant lagoon sludge must be considered a candidate for a hazardous waste site as it exceeds the drinking water standard for every element reported, in some cases as much as a 1,000 fold. Furthermore, it is the staff's opinion that the East Chicago Sewage Treatment Plant lagoon sludge will be considered a hazardous waste under the guidelines of the Resource Conservation and Recovery Act of 1976. A copy of the Resource Conservation and Recovery Act is enclosed.

For the future, the staff strongly suggests that strict enforcement of a heavy metal discharge limit for industries using the City's sewer system be implemented. Only through limiting the amount of discharge by industries will the heavy metal concentration in the City's sewer sludge be reduced.

If you are still interested in disposing of material in an Indiana landfill equipped with a separate area, then the staff requests that you submit a letter that a mistake was made on the lab report and that the digestor sludge referred to in that report is actually the lagoon sludge for which you are seeking approval for disposal.

If you have any questions, please contact Mr. Bruce Palin or Mr. Guinn Doyle of the Solid Waste Management Section at AC 317/633-0176.

Very truly years,

Quality Hert

Oral H. Hert Technical Secretary

BHPalin/vme Enclosure

cc: Mr. Joseph Stallsmith